

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

2025 JUN -9 PM 2:49

OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANGELA ROCIO URRUTIA CRUZ and
MIGUEL ANGEL SALAZAR-ZUNIGA,

Defendants.

8:25CR 128

INDICTMENT

8 U.S.C. § 1324(a)(1)(A)(v)(I) &
(a)(1)(B)(i)

8 U.S.C. § 1324(a)(1)(A)(iv) and (v)(II)

The Grand Jury charges that:

COUNT I

CONSPIRACY TO ENCOURAGE OR INDUCE ILLEGAL ENTRY

From about May 1, 2022 to May 28, 2025, in the District of Nebraska and elsewhere, the defendants, ANGELA ROCIO URRUTIA CRUZ and MIGUEL ANGEL SALAZAR-ZUNIGA, and others known and unknown to the Grand Jury, for the purpose of commercial advantage and private financial gain, did knowingly and in reckless disregard of the fact that aliens had come to, entered, and resided in the United States in violation of law, did conspire to encourage and induce such aliens to reside in the United States in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv) and (a)(1)(B)(i).

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and (a)(1)(B)(i).

COUNT II

ENCOURAGING OR INDUCING ILLEGAL ENTRY

On or about May 1, 2022 to May 28, 2025, in the District of Nebraska, the defendants, ANGELA ROCIO URRUTIA CRUZ and MIGUEL ANGEL SALAZAR-ZUNIGA, aided and abetted by one another and others known and unknown to the Grand Jury, for the purpose of commercial advantage and private financial gain, did encourage and induce an alien, namely,

Individual 1, to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv) and (v)(II).

COUNT III

ENCOURAGING OR INDUCING ILLEGAL ENTRY

On or about May 1, 2022 to May 28, 2025, in the District of Nebraska, the defendant, ANGELA ROCIO URRUTIA CRUZ and MIGUEL ANGEL SALAZAR-ZUNIGA, aided and abetted by one another and others known and unknown to the Grand Jury, for the purpose of commercial advantage and private financial gain, did encourage and induce an alien, namely, Individual 2, to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv) and (v)(II).

COUNT IV

ENCOURAGING OR INDUCING ILLEGAL ENTRY

On or about May 1, 2022 to May 28, 2025, in the District of Nebraska, the defendant, ANGELA ROCIO URRUTIA CRUZ and MIGUEL ANGEL SALAZAR-ZUNIGA, aided and abetted by one another and others known and unknown to the Grand Jury, for the purpose of commercial advantage and private financial gain, did encourage and induce an alien, namely, Individual 3, to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv) and (v)(II).

COUNT V

ENCOURAGING OR INDUCING ILLEGAL ENTRY

On or about May 1, 2022 to May 28, 2025, in the District of Nebraska, the defendant, ANGELA ROCIO URRUTIA CRUZ and MIGUEL ANGEL SALAZAR-ZUNIGA, aided and abetted by one another and others known and unknown to the Grand Jury, for the purpose of

commercial advantage and private financial gain ,did encourage and induce an alien, namely, Individual 4, to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv) and (v)(II).

COUNT VI

ENCOURAGING OR INDUCING ILLEGAL ENTRY

On or about May 1, 2022 to May 28, 2025, in the District of Nebraska, the defendant, ANGELA ROCIO URRUTIA CRUZ and MIGUEL ANGEL SALAZAR-ZUNIGA, aided and abetted by one another and others known and unknown to the Grand Jury, for the purpose of commercial advantage and private financial gain, did encourage and induce an alien, namely, Individual 5, to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv) and (v)(II).

COUNT VII

ENCOURAGING OR INDUCING ILLEGAL ENTRY

On or about May 1, 2022 to May 28, 2025, in the District of Nebraska, the defendant, ANGELA ROCIO URRUTIA CRUZ and MIGUEL ANGEL SALAZAR-ZUNIGA, aided and abetted by one another and others known and unknown to the Grand Jury, for the purpose of commercial advantage and private financial gain, did encourage and induce an alien, namely, Individual 6, to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv) and (v)(II).

FORFEITURE ALLEGATION

1. The allegations contained in Counts I-VII of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 8, United States Code, Section 1324(b) and Title 18, United States Code, Section 982(a)(6).

2. Pursuant to Title 8, United States Code, Section 1324(b) and Title 18, United States Code, Section 982(a)(6), upon conviction of an offense in violation of Title 18, United States Code, Section 1324, the defendants, ANGELA ROCIO URRUTIA CRUZ and MIGUEL ANGEL SALAZAR-ZUNIGA, shall forfeit to the United States of America any conveyance, including any vessel, vehicle, or aircraft, used in the commission of the offense of which the defendants is are convicted, any property, real or personal, that constitutes or is derived from or is traceable to the gross proceeds obtained directly or indirectly from the commission of the offense of which the defendants is are convicted, and any property, real or personal, used to facilitate or intended to be used to facilitate the commission of the offense of which the defendants are convicted. The property to be forfeited includes, but is not limited to, the following:

a. 5524 N 34th Street in Omaha, Nebraska, 68111, also described as THE SOUTH TRIANGULAR 40 FEET OF LOT 133 AND THE NORTH TRIANGULAR 5.8 FEET OF LOT 134, CHARLSEW HEIGHTS, AN ADDITION TO THE CITY OF OMAHA, AS SURVEYED, PLATTED, AND RECORDED IN DOUGLAS COUNTY, NEBRASKA, TOGETHER WITH THAT PORTION OF VACATED FIRESTONE AVENUE ADJOINING THERETO.

3. If any of the property described above, as a result of any act or omission of the defendants:

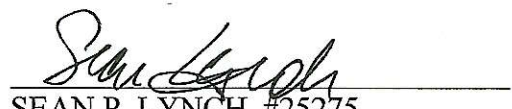
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL.


FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.


SEAN P. LYNCH, #25275
Assistant U.S. Attorney